

AFFIDAVIT

State of Alabama

Elmore County

BEFORE ME, the undersigned Authority, appeared Cecil Calloway, JR who is known to me and who, having duly sworn, deposed and states as follows:

My name is Cecil (Butch) Calloway, Jr., I have been a resident of Elmore County, Alabama, for more than six months and I am over the age of twenty-one years.

I am the Food Processing Superintendent of Institutional Services Division of the Alabama Department of Corrections. My duties include the supervision of the Meat Processing Supervisor and inmates assigned to Meat Processing Section.

"Cedric Pugh, Plaintiff, stated that on or about February 23, 2006 that he was instructed to operate machinery at the Meat Processing Plant which is true. He was "instructed" on how to operate the piece of machinery he was operating. He was also told numerous times to never stick his hands into that piece of machinery due to obvious safety reasons. There is no reason for anyone to place their hands or any other object into that machine. The being the machine is an Automatic Feed Mixer Ginder, not a "Meat Chipper" which the plaintiff has not ever operated as stated in the complaint. February 23, 2006 was not the "first day" that the plaintiff had operated that machine. He was trained and instructed on January 31, 2006, February 1, 2006 and February 2, 2006 as well as numerous other days before his February 23, 2006 "incident".


Cecil (Butch) Calloway, Jr.

SWORN and SUBSCRIBED before me this the 25th day of May, 2006.


NOTARY PUBLIC

Commission expires

My commission expires March 29, 2008

EXHIBIT

B

tabbles

ELMORE CORRECTIONAL FACILITY
JCS SQUAD SIGNOUT ROSTER C

INMJSC

JAN. 31, 2006

CWH MEAT
CENTRAL WAREHOUSE

PH#: 867-1710 FAX: 000-0000 CELL: 000-0000

INMATE NAME	AIS-NR	R	BIRTH-DT	BED#	JOB-DATE	APPOINTMENT - TIME
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CWH MAINT

REED, KENNETH	149541	W	07/24/1961	A1 144	12/23/2005	
REEDLINGER, JEREMY	238520	W	10/24/1978	A1 189	05/13/2006	
SLEDGE, JOSEPH	149174	W	01/24/1967	A1 139	05/05/2004	
WILLIAMS, VINCENT	224298M	B	07/08/1961	C1 027	11/30/2005	
TOTAL ASSIGNED TO THIS DETAIL IS					4	

CWH MEAT

BETTS, TIMOTHY	202617R	B	05/03/1967	A1 035	06/24/2005	
BURRELL, CARL E.	138525	B	01/01/1962	B1 160	01/13/2006	
CATLIN, CARL	239737	B	01/03/1983	B1 117	08/12/2005	
CLARK, CHRISTOPHER	240382	W	09/24/1967	C1 135	05/19/2005	
COLEVIN, STEVEN A.	214647	W	03/06/1954	B1 186	01/13/2006	
CURETON, JONATHAN	229438	W	12/25/1980	C1 059	01/25/2006	
DOZIER, DONALD	227824	B	10/04/1981	A2 078	11/30/2005	
FELDER, PATRICK	223103	B	03/17/1965	B1 147	06/29/2005	
GLASS, ROGER	184241RM	W	05/19/1948	A1 070	01/30/2006	
GREEN, FRAZIER	242182	B	11/04/1973	B2 193	01/13/2006	
HILL, WALTER JR	187805	B	04/17/1962	B2 168	10/07/2005	
HOGAN, DENNIS LOUI	153364	B	09/28/1969	B2 196	12/02/2005	
HOLLEY, DONTRELL	180996RM	B	12/26/1974	A1 146	12/19/2005	
HUDDLESTON, TIMOTHY	241915	W	04/08/1966	C1 031	01/18/2006	
JAMES, DAVID	242628	W	10/11/1983	C2 045	01/18/2006	
JOHNSTON, SCOTT	191390	W	05/23/1974	A1 177	08/29/2005	
MAHAM, ALEX	243971	B	01/22/1963	C2 119	01/18/2006	
MCDONALD, MICHAEL	129413	W	09/01/1961	C1 181	09/09/2005	
MILLER, ERIC DEWAY	194616	B	09/21/1971	C1 145	01/11/2006	
MOSLEY, JAMES	187312	B	10/07/1972	A1 073	02/22/2005	
PATTERSON, STEWART	228931	B	05/15/1961	C1 045	07/18/2005	
PERKINS, RICHARD	167731R	B	03/02/1968	A2 175	01/18/2006	
RUSH, CEDRIC	182373	B	09/21/1975	B2 146	01/30/2006	
RAINEY, TRENT S.	194273	B	11/16/1963	B1 173	08/31/2005	
RUSSELL, ANTOIN	241406	B	06/06/1983	B2 042	12/02/2005	
SMITH, LORENZO	167719RM	B	08/18/1973	A1 013	12/19/2005	
STEPHENSON, SHANNO	204010	B	10/22/1968	B2 134	12/07/2005	
TARVER, WILLIAM	243576	W	05/29/1957	B2 041	01/13/2006	
TAYLOR, CEASAR	201553	B	05/28/1978	B2 058	10/26/2005	
TOLBERT, LARRY	182455R	B	08/03/1975	B2 016	11/08/2005	
WARREN, DEMARCUS	243921	B	05/13/1978	C2 093	01/13/2006	
WHEATSTONE, TONY	214317	B	04/27/1971	C2 176	11/02/2005	
YOWE, JAMES	205290	B	08/24/1969	A1 094	05/14/2004	

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ELMORE CORRECTIONAL FACILITY
JOB SQUAD SIGNOUT ROSTER C

FEB. 01, 2006

INMJSO

CWH MEAT
CENTRAL WAREHOUSE

PH#: 567-1710 FAX: 000-0000 CELL: 000-0000

INMATE	NAME	AIS-NR	R	BIRTH-DT	BED#	JOB-DATE	APPOINTMENT	TIME
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CWH MAINT

REED, KENNETH	149541	W	07/24/1961	A1	144	05/23/2005		
RIEDLINGER, JEREMY	238520	W	10/24/1978	A1	189	05/13/2006		
SLEDGE, JOSEPH	149174	W	01/24/1957	A1	139	05/05/2004		
WILLIAMS, VINCENT	224298M	B	07/08/1961	C1	027	11/30/2005		
TOTAL ASSIGNED TO THIS DETAIL IS						4		

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CWH MEAT

BETTS, TIMOTHY	202617R	B	05/03/1967	A1	177	06/24/2005		
BURRELL, CARL E.	136525	B	01/01/1962	B1	160	01/13/2006		
CATLIN, CARL	239737	B	01/03/1983	B1	117	08/12/2006		
CLARK, CHRISTOPHER	240382	W	09/24/1967	C1	138	01/11/2006		
COLVIN, STEVEN A.	214647	W	03/06/1954	B1	186	01/13/2006		
CURETON, JONATHAN	229438	W	12/25/1980	C1	059	01/26/2006		
DOZIER, DONALD	227824	B	10/04/1981	A2	078	11/30/2005		
FELDER, PATRICK	223103	B	03/17/1965	B1	147	06/29/2005		
GLASS, ROGER	184241RM	W	05/19/1948	A1	070	01/30/2006		
GREER, FRAZIER	242182	B	11/04/1973	B2	193	01/13/2006		
HILL, WALTER JR.	187805	B	04/17/1962	B2	168	10/07/2005		
HUGHES, DENNIS LOUI	153364	B	09/28/1969	B2	196	12/02/2005		
HOLLEY, DONTRELL	180996RM	B	12/26/1974	A1	146	12/19/2005		
HUNGLESTON, TIMOTHY	241915	W	04/08/1966	C1	031	01/18/2006		
JAMES, DAVID	242628	W	10/11/1983	C2	045	01/18/2006		
JOHNSTON, SCOTT	191390	W	05/23/1974	A1	165	08/29/2005		
MAHAN, ALEX	243971	B	01/22/1963	C2	119	01/18/2006		
MCDANAL, MICHAEL	129413	W	09/01/1961	C1	181	09/09/2005		
MILLER, ERIC DEWAY	194616	B	09/21/1971	C1	145	01/11/2006		
MOSELEY, JAMES	187312	B	10/07/1972	A1	073	02/22/2005		
PATTERSON, STEWART	228931	B	05/15/1961	A1	035	07/18/2005		
PERKINS, RICHARD	167731R	B	03/02/1968	A2	175	01/18/2006		
PUGH, CEDRIC	182373	B	09/21/1975	B2	146	01/30/2006		
RAINEY, TRENT S.	194273	B	11/16/1963	B1	173	08/31/2005		
RUSSELL, ANTOIN	241406	B	05/06/1983	B2	042	12/02/2005		
SMITH, LORENZO	167719RM	B	08/18/1973	A1	013	12/19/2005		
STEPHENSON, SHANNO	204010	B	10/22/1968	B2	134	12/07/2005		
TARVER, WILLIAM	243576	W	05/29/1967	B2	041	01/13/2006		
TAYLOR, CEASAR	201553	B	05/28/1978	B2	068	06/24/2005		
TOLBERT, LARRY	182455R	B	08/03/1975	B2	016	11/06/2005		
WARREN, DEMARCUS	243921	B	05/13/1978	C2	093	01/13/2006		
WHEATSTONE, TONY	214317	B	04/27/1971	C2	176	11/02/2005		
YOUNG, JAMES	208296	B	08/24/1969	A1	094	05/14/2004		

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ELMORE CORRECTIONAL FACILITY
JOB SQUAD SIGNOUT ROSTER C

FEB. 02, 2006

INMOSQ

CWH MEAT
CENTRAL WAREHOUSE

PH#: 567-1710 FAX: 000-0000 CELL: 000-0000

INMATE	NAME	AIS-NR	R	BIRTH-DT	BED#	JOB-DATE	APPOINTMENT - TIME
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CWH MAINT

REED, KENNETH	149541	W	07/24/1961	A1 144	12/23/2005		
RIEDLINGER, JEREMY	238520	W	10/24/1978	A1 189	05/13/2005		
WLEDGE, JOSEPH	149174	W	01/24/1967	A1 139	05/05/2004		
WILLIAMS, VINCENT	224298M	B	07/08/1961	C1 027	11/30/2005		

TOTAL ASSIGNED TO THIS DETAIL IS 4

4

CWH MEAT

SETTS, TIMOTHY	202617R	B	05/03/1967	A1 177	05/24/2005		
SURRO, CARL E.	138525	B	01/01/1962	B1 160	01/13/2006		

MR. SMITH

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STALIN, CARL	239737	B	01/03/1983	B1 117	08/12/2005		
DEAR, CHRISTOPHER	240382	W	09/24/1957	C1 135	01/11/2006		
COLVIN, STEVEN A.	214647	W	03/06/1954	B1 186	01/13/2006		
SHURETON, JONATHAN	229438	W	12/25/1980	C1 059	01/26/2006		
DOZIER, DONALD	227824	B	10/04/1981	A2 078	11/30/2005		
BELDER, PATRICK	223103	B	03/17/1965	B1 147	06/29/2005		
GLASS, ROGER	184241RM	W	05/19/1948	A1 070	01/30/2006		
GREEN, FRAZIER	242182	B	11/04/1973	B2 193	01/13/2006		
WELLS, WALTER JR	187805	B	04/17/1962	B2 168	10/07/2005		
HOGAN, DENNIS LOUI	153364	B	09/28/1969	B2 196	12/02/2005		
HOLLEY, DONIRELL	180996RM	B	12/26/1974	A1 146	12/19/2005		

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HOODLESTON, TIMOTHY	241915	W	04/08/1966	C1 031	01/18/2006		
JAMES, DAVID	242622	W	10/11/1983	C2 045	01/18/2005		
JOHNSTON, SCOTT	191390	W	05/23/1974	A1 165	08/29/2005		
MAHAN, ALEX	243971	B	01/22/1963	C2 119	01/18/2006		
MCDANAL, MICHAEL	129413	W	09/01/1961	C1 181	09/09/2005		
MILLER, ERIC DEWAY	194616	B	09/21/1971	C1 145	01/11/2006		
MOSLEY, JAMES	187312	B	10/07/1972	A1 073	02/22/2005		
PATTERSON, STEWART	228931	B	06/15/1961	A1 035	07/18/2005		
PERKINS, RICHARD	167731R	B	03/02/1968	A2 175	01/18/2006		
POUGH, CEDRIC	182373	B	09/21/1975	B2 146	01/30/2006		
RAINEY, TRENT S.	194273	B	11/16/1963	B1 173	08/31/2005		
RUSSELL, ANTOIN	241406	B	06/06/1983	B2 042	12/02/2005		
SMITH, LORENZO	167719RM	B	08/18/1973	A1 013	12/19/2005		
STEPHENSON, SHANNO	204010	B	10/22/1968	B2 134	12/07/2005		
TARVER, WILLIAM	243576	W	05/29/1957	B2 041	01/13/2006		
TAYLOR, CEASAR	201553	B	05/28/1978	B2 058	10/26/2005		
TOLBERT, LARRY	182455R	B	08/03/1975	B2 016	11/08/2005		
WARREN, DEMARCUS	243921	B	05/13/1978	C2 093	01/13/2006		

C. Taylor
Moshel
Stiggins
Myers

Miller

Raine

Patterson

Glass

Hale

Colvin

Hawkins

Kennedy

Pugh

Hill

Perkins

Russell

Logan

McDaniel

PAGE: 7

ELMORE CORRECTIONAL FACILITY
JOB SQUAD SIGNOUT ROSTER C

INMJSO

FEB. 02, 2006

CWH MEAT
CENTRAL WAREHOUSE

PH#: 567-1710 FAX: 000-0000 CELL: 000-0000

INMATE	NAME	AIS-NR	R	BIRTH-DT	BED#	JOB-DATE	APPOINTMENT - TIME
WHETSTONE,	TONY	214317	B	04/27/1971	C2 176	11/02/2005	
YOWE,	JAMES	205290	B	08/24/1969	A1 094	05/14/2004	
TOTAL ASSIGNED TO THIS DETAIL IS					33		

TOTAL ASSIGNED THIS SQUAD IS 37

TOTAL OUT: 34 TIME OUT: 620 DATE: _____RECEIVED BY: [Signature] OFFICER: _____
F NONN/D DONOVAN/B FOMBY

TOTAL IN: _____ TIME IN: _____ DATE: _____

RETURNED BY: _____ OFFICER: _____